

**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF MASSACHUSETTS**

**In Re:**

**John Malone,**  
**Debtor**

**Chapter 13**  
**Case No. 24-10885**

**RESPONSE TO FEDERAL HOME LOAN MORTGAGE COMPANY'S OBJECTION**  
**TO CONFIRMATION OF DEBTOR'S SECOND AMENDED CHAPTER 13 PLAN**

Now comes the Debtor and responds to Federal Home Loan Mortgage Company's Objection to Confirmation of Debtor's Second Amended Chapter 13 Plan. In support thereof the Debtor states as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted, but Debtor has filed a Motion to Sell which provides for Federal Home Loan Mortgage Company's claim to be paid in full, including pre and post-petition arrears.
6. Denied, as the Debtor is seeking to sell his real estate for \$765,000.00 and there is plenty of equity to pay Federal Home Loan Mortgage Company in full from the sale.

**Wherefore**, the Debtor requests the Court find as follows:

1. Federal Home Loan Mortgage Company's Objection be denied.
2. For such other relief as the Court deems just.

Debtor,  
by his attorney,

Dated: November 18, 2025

/s/ John Ullian

John Ullian, Esq. BBO# 542786  
Amy Puliafico, Esq. BBO# 682332  
The Law Firm of Ullian & Associates, P.C.  
220 Forbes Road, Suite 106  
Braintree, MA 02184  
(781) 848-5980

**CERTIFICATE OF SERVICE**

I, John Ullian, hereby certify under the pains and penalties of perjury that I served the **RESPONSE TO FEDERAL HOME LOAN MORTGAGE COMPANY'S OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN** by ECF or by mailing a copy of same, postage prepaid, to the following interested parties:

Richard King  
Office of the US Trustee  
J.W. McCormack Post Office & Courthouse  
5 Post Office Sq., 10th Fl, Suite 1000  
Boston, MA 02109

John Malone  
28 Savin Hill Avenue  
Dorchester, MA 02125

Federal Home Loan Mortgage Corporation  
Jason Giguere  
Zwicker & Associates, P.C.  
80 Minuteman Road  
Andover, MA 01810

Carolyn Bankowski  
Chapter 13 Trustee Boston  
P. O. Box 8250  
Boston, MA 02114

Federal Home Loan Mortgage Corporation  
Brian M Kiser  
Marinosci Law Group, P.C.  
275 West Natick Road, Suite 500  
Warwick, RI 02886  
Federal Home Loan Mortgage Corporation  
Joseph Dolben  
Harmon Law Offices, P.C.  
150 California Street  
Newton, MA 02458

Dated: November 18, 2025

/s/ John Ullian

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